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MCB CAMP LEJEUNE
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U S NAVY RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENTA AND
NATURAL RESOURCES AND U S EPA REGION IV COMMENTS TO DRAFT EXPANDED
SITE INVESTIGATION REPORT SITE 15 MCB CAMP LEJEUNE NC

4/23/2012
U S NAVY

Response to Comments
Draft Expanded Site Investigation Report
Site 15
Marine Corps Base Camp Lejeune, North Carolina

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Introduction

The purpose of this document is to address comments on the Draft Expanded Site Investigation (ESI) report for Site 15 located at Marine Corps Base Camp Lejeune (MCB CamLej). The North Carolina Department of Environment and Natural Resources (NCDENR) and United States Environmental Protection Agency (USEPA) provided the comments listed below. The responses to comments are provided in bolded text.

North Carolina Department of Environment and Natural Resources (dated March 22, 2012)

1. Appendix F-2, Table 5: A comparison of the sampling results in the human health data to the ecological data showed the following should be corrected in Table 5: di-n-butylphthalate, frequency of detection 1/8, maximum concentration 0.23 ug/L; acetone frequency of detection 3/9, maximum concentration 5 ug/L.

The contaminants statistics in Appendix F of the ecological risk assessment are correct. A review revealed that the HHRA used unvalidated data for acetone and di-n-butylphthalate. The detections for these two compounds were initially flagged as "J". Once they were validated, the analytes were designated undetected ("U"). The HHRA tables were updated with the validated data.

2. Appendix F-2, Table 3: The screening values for Total PAHs (both high and low molecular weight), PCBs, and DDD/DDD/DDT are for totals, not individual concentrations. Please correct.

The requested changes were made to the ERA. The conclusions to the ERA did not change.

3. It is stated in the Appendix E Tables 2.x that the May 2011 Regional Screening Level values were used in the risk assessment. The RSLs were updated in November 2011 and should be incorporated into this and future risk assessments.

The most recent RSLs were used when the HHRA was completed. A comparison of the data to November 2011 RSLs does not affect the conclusions of the HHRA.

4. Appendix E-2, Tables 7.x: Both the chromium VI measured and estimated concentrations are listed as 1.1 mg/L. According to previous tables in Appendix E, the estimated concentration should be 2.3 mg/L. Please explain or correct.

The maximum estimated concentration of chromium VI is 2.3 mg/L is, as shown in Appendix E, Table 2.1. The EPC (the 95 % UCL of the mean) is 1.1 mg/L for the estimated chromium VI concentrations, as shown in Appendix E, Table 3.1.RME, which is the same as the measured chromium VI concentration. Therefore, the values in Table 7s are correct.

United States Environmental Protection Agency (dated March 26, 2012)

1. EPA acknowledges the findings of no unacceptable human health or ecological risk and also acknowledges that buried inert material is still present in this area. Therefore, this agreement of no further action is supported by the designated undeveloped and use. However, if there is a change in the current land use, additional sampling may be required and risk re-evaluated.

Comment noted.